

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA

Vs.

Case No.: 12-cr-20272-3
Hon. Denise Page Hood

D-3 ABDUL MALIK AL-JUMAIL, aka “Tony”

Defendant.

**DEFENDANT AL-JUMAIL’S MOTION TO EXTEND
SCHEDULING ORDER**

NOW COMES, Defendant Abdul Malik “Tony” Al-Jumail, and
states the following as his Unopposed Motion for Extension of the
Scheduling Order:

1. On September 5th, 2013, your Honor reset the scheduling order in this
matter to reflect the following pertinent dates:

Motions must be filed by: November 1, 2013

A hearing date on motions and/or conference is set for: December 4,
2013, 2:00 p.m.

Plea Cut-Off date: January 10, 2014

Pretrial Conference date: January 23, 2014, 2:00 p.m.

Trial is set for: February 25, 2014, 9:00 a.m.

2. As discovery has just cut off on September 20, 2013, Defendant seeks a 60 day extension of the current Motion cut off date which has been set for November 1, 2013.
3. Due to the nature of the voluminous discovery, motions by this Defendant are still in the works and will not be completed until the full discovery is digested.
4. Furthermore, counsel seeks only an extension of the motion cut off for 60 days and plea cut off for another few days as trial is still months away.
5. As of today, this counsel, Attorneys for Jamella Al-Jumail (D-6), Mohammed Sadiq (D-5), Khalil Mackie (D-11), Clarence Cooper (D-8), Carey Vigor (D-10), and Philandis Thomas (D-13) have agreed to the proposed Motion cut off date and adoption of the dates below.
6. Co-Defendants, Sachin Sharma (D-1), Dana Sharma (D-2), Beverly Cooper (D-9), and Robert So (D-12) have already taken Rule 11 Pleas.
7. Co-Defendant Firas Alky is unrepresented by counsel and his whereabouts unknown.
8. The remaining co-defendant, Felicar Williams (D-4), has not responded to this request.

9. Counsel sought concurrence from the government, however, no response has been obtained.

10. It is for these reasons, that Defendant respectfully requests that this Honorable Court, reset the scheduling order as follows:

- a. The current Motion Cut-Off date of November 1, 2013 be extended until January 1, 2014 (by 60 days);
- b. That the hearing date on motions, and/or conference be held in January 2014 after the Motion cut off date, but prior to the Plea Cut off;
- c. The Current Plea Cutoff/Final Status Conference of January 23, 2014 (remain the same);
- d. The Current Jury Trial date of February 25, 2014 at 9:00 am (remain the same).

11. Due to the complex nature of these proceedings including the voluminous discovery produced, and the Superseding Indictment, an extension of the scheduling order is requested in good faith and not for the purpose of delay.

WHEREFORE, Defendant AL-Jumail PRAYS that his motion to Extend the Scheduling Order be granted and that the dates be re-set accordingly.

Respectfully submitted,

AYAD LAW, PLLC

Dated: November 1, 2013

By: /s/ Nabih H. Ayad

Nabih H. Ayad (P59518)

Attorney for Defendant AlJumail

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CERTIFICATION OF SERVICE

I hereby certify that on November 1, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

WILLIAM G. KANELIS
william.kanellis2@usdoj.gov

I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants:

None

/s/NABIH H. AYAD
Nabih H. Ayad (P-59518)
Attorney for Defendant Al-Jumail

CERTIFICATION OF SERVICE

I hereby certify that on September 27, 2012, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

WILLIAM G. KANELIS
william.kanellis2@usdoj.gov

I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants:

None

/s/NABIH H. AYAD
Nabih H. Ayad (P-59518)
Attorney for Defendant Al-Jumail